

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

**BEVERLY B. MARTIN, as next friend
of KHALID MOUTON,**

Plaintiff,

vs.

AHMED HOLT, et al.,

Defendants.

**CIVIL ACTION NO.
5:23-cv-00004-MTT-CHW**

**DEFENDANTS' MOTION TO EXTEND TIME TO FILE A REPLY IN SUPPORT OF
THEIR MOTION TO DISMISS**

Defendants Ahmed Holt, Robert Toole, Stan Shepard, Jack Sauls, Sharon Lewis, Trevonza Bobbitt, Michael Anderson, Josh Wicker, Deidra Edwards, Juanita Sharpe, Chad Putnam, Joseph Hall, Shayla McClain, Barnard Florence, Cierra Harper, Jessica Howard, Carl Anderson, Marjorie Glover, Cory Osborne, Heather Flowers, Angela Howell, Kenneth Scott, and Teyundra Hamilton, by and through counsel, and with the consent of Plaintiff, respectfully move for an extension of time to file a reply in support of their motion to dismiss Plaintiff's amended complaint, showing as follows:

1. Plaintiff filed an amended complaint on March 30, 2023. Doc. 67.
2. Defendants moved to dismiss the amended complaint on April 27, 2023. Doc. 73.
3. Plaintiff responded to the motion on May 10, 2023, Doc. 78, with the result that Defendants' reply is currently due May 31, 2023.
4. The undersigned counsel's twin brother and sister-in-law are scheduled to give birth to a baby girl with a fatal birth defect sometime near the end of May. As a result, the undersigned counsel

anticipates being on leave sometime near the end of May and/or beginning of June to be with her family and plan and attend the funeral.

5. The undersigned counsel therefore anticipates needing additional time to draft a reply brief and requests an extension to June 15, 2023.

6. Counsel for Plaintiff consents to the proposed extension.

WHEREFORE, Defendants request that the Court grant this motion and extend the time for them to file a reply in support of their motion to dismiss to June 15, 2023.

Respectfully submitted,

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Attorney General

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/s/ Ellen Cusimano
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CERTIFICATE OF SERVICE

I certify that I have this day served the foregoing pleading with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

This 24th day of May, 2023.

/s/ Ellen Cusimano
Ellen Cusimano